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VIA ECF

The Honorable Sarah L. Cave
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 18A
New York, NY 10007-1312

Re: *Flynn et al v. Cable News Network, Inc.*, No. 1:21-cv-02587-GHW-SLC


Dear Judge Cave:

We represent Defendant Cable News Network (“CNN”) in the above-referenced action. Pursuant to Federal Rule of Civil Procedure 5.2(e) and 26(c), and Your Honor’s individual practice rule 1.F, we respectfully request to file the redacted portions of CNN’s concurrently-filed letter-motion under seal given that the letter references exhibits and deposition transcripts that have been designated as “Highly Confidential” pursuant to the March 15, 2022 Confidentiality Stipulation and Protective Order (Dkt. 60) in this action.

We thank the Court for its consideration of this matter.

Respectfully Submitted,

Davis Wright Tremain LLP


Katherine M. Bolger